



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7**

11201 Renner Boulevard
Lenexa, Kansas 66219
FEB 19 2016

Mr Paul Rosasco, P E
Engineering Management Support, Inc
7220 West Jefferson Avenue, Suite 406
Lakewood, Colorado 80235

Re Framework for an Incident Management Plan West Lake Landfill Operable Unit 01,
Bridgeton, Missouri, dated December 28, 2015

Dear Mr Rosasco

The U S Environmental Protection Agency (EPA) is providing the enclosed comments on the above mentioned document dated December 28th, 2015 prepared by Engineering Management Support Inc (EMSI)

Please take these comments into consideration as you proceed with the development of an Incident Management Plan (IMP) for Operable Unit 01 (OU1), as required by paragraph 34b of the December 9, 2015 Unilateral Administrative Order for Removal Action at the West Lake Landfill Superfund Site, EPA Docket No CERCLA-07-2016-002 Please submit the IMP draft document within 30 days of your receipt of this letter

If you have any questions pertaining to this letter, please contact me by phone at (913) 551-7416, by written correspondence to my attention at the EPA – Region 7, 11201 Renner Boulevard, Lenexa, Kansas 66219, or by email to mahler tom@epa.gov

Sincerely,

for Tom Mahler

Tom Mahler
On-Scene Coordinator
Missouri/Kansas Remedial Branch
Superfund Division

Enclosure

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**Comments on the Framework for an Incident Management Plan
West Lake City Landfill Site, Operable Unit 01, Bridgeton, Missouri
Dated December 28, 2015**

Administrative Comments

- 1 General comment The EPA agrees with the submitted IMP framework document in that the existing Bridgeton IMP should be revised, expanded upon, improved, and updated to include all West Lake site areas

Specific Comments

- 1 From bullets provided in Section 2 of the IMP framework, page 2 In the pending IMP document, please provide clear language that differentiates between the site activities of “Generation, storage and treatment of leachate” from “Collection and disposal of landfill leachate ”
- 2 Section 3 In the pending IMP, please ensure that the buffer zone is identified as an area of OU1 that will be covered by the provisions of the IMP
- 3 Section 3, subpart 1 Please specify how the “24/7 inspection and monitoring program” will allow continuous observation of Area 1 and Area 2 The EPA maintains that electronic surveillance is an appropriate measure to be used to help ensure continuous observation of OU1
- 4 Section 3, subpart 5 Please clarify in the text of the pending IMP that the manager and technician (and any other responders) will be qualified to respond to emergencies at or in OU1
- 5 Section 4 – Schedule In the pending IMP, please include time frames and any other appropriate details related to plans to continue to hold additional First Responder meetings